

**IN THE DISTRICT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

RECEIVED
USCG CLERK, GREENVILLE, SC
104 FEB 24 P 2:20

UNITED STATES OF AMERICA

Plaintiff,

v.

GORDON L HALL

Defendant.

CASE NO. 6:13-cr-00170-JMC-1

**DEFENDANT'S ACCEPTANCE OF
AMENDED PETITION TO ENTER PLEA
OF GUILTY (ECF #222) ON CONDITION
TO CORRECTION AND REQUEST TO
FORGIVE FOR MISTAKE**
**[filed concurrently with DECLARATION
IN SUPPORT OF DEFENDANT'S
ACCEPTANCE OF AMENDED
PETITION TO ENTER PLEA OF GUILTY
(ECF #222) ON CONDITION TO
CORRECTION AND REQUEST TO
FORGIVE FOR MISTAKE]**

COMES NOW the Defendant, GORDON L. HALL, giving notice of Defendant's conditional acceptance to the "AMENDED PETITION TO ENTER PLEA OF GUILTY" (ECF #222) dated February 18, 2014, hereinafter "PLEA."

The Defendant GORDON L. HALL accepts the PLEA on condition that the PLEA is corrected to reflect "Yes" instead of "No" to question #42(a) in the PLEA. Additionally on condition that ECF #225 "PETITION FOR ENTRY OF AMENDED PLEA AGREEMENT OR EXTENSION OF TIME [filed concurrently with DECLARATION IN SUPPORT OF PETITION FOR ENTRY OF AMENDED PLEA AGREEMENT OR EXTENSION OF TIME]" is incorporated into the PLEA as an integral part of the PLEA (ECF #222).

Defendant's mistake was a misconception that ECF #225 would automatically be incorporated into the plea agreement of February 7, 2014, and subsequently into the plea

agreement of February 18, 2014 (ECF #222), the “PLEA,” pursuant to the Government’s non response to the E-Mails of February 13th and February 16th 2014 as the apparent intent of the parties made manifest by their actions, including but not limited to similar contracts concerning ECF #’s 82, 192, 193, 225, et cetera as the true intent of the parties that the matter having been properly resolved by the Government and the Defendant agreeing to recommend the provisions of ECF #192 as a particular sentence proper for the disposition of this instant Case. Defendant’s mistake was realizing that “No” on question #42(a) of the PLEA corresponded and was correct under Traditional Contract Law, however, under Modern Contract Law the answer to question #42(a) of the PLEA should have been “Yes” in accordance with ECF #192 as made manifest by the Record. For any offense, inconvenience, et cetera the Defendant has caused the Court and the Government, the Defendant has but two words, “FORGIVE ME.”

CONCLUSION

WHEREFORE, the Defendant Petitions this Court to correct the PLEA (Question #42(a) to reflect “Yes”) by accepting the recommendations and provisions in ECF #192 as a particular sentence proper for the disposition of this instant Case and grant such other and further relief as is just and proper.

Respectfully submitted this 20th day of February 2014,

GORDON L HALL
